

1 CHERYL D. ORR (State Bar No. 143196)  
HEATHER M. SAGER (State Bar No. 186566)  
2 CHERYL A. SABNIS (State Bar No. 224323)  
DRINKER BIDDLE & REATH LLP  
3 50 Fremont Street, 20th Floor  
San Francisco, California 94105-2235  
4 Telephone: (415) 591-7500  
Facsimile: (415) 591-7510  
5 E-mail: [cheryl.orr@dbi.com](mailto:cheryl.orr@dbi.com)  
[heather.sager@dbi.com](mailto:heather.sager@dbi.com)  
6 [cheryl.sabnis@dbi.com](mailto:cheryl.sabnis@dbi.com)

7 Attorneys for Defendant  
8 RGIS LLC, formerly known as  
9 RGIS INVENTORY SPECIALISTS

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13 TRISHA WREN, et al.,  
14 Plaintiffs,  
15 v.  
16 RGIS INVENTORY SPECIALISTS,  
17 Defendant.

Case Nos. C06 5778 JCS and  
C07-0032 JCS

**STIPULATION AND ~~[PROPOSED]~~  
ORDER TO EXTENSION OF TIME TO  
PERMIT DEPOSITIONS IN ADVANCE  
OF OPPOSITION AND REPLY  
BRIEFING REGARDING  
PLAINTIFFS' MOTION TO  
FACILITATE NOTICE**

**[Civ. L.R. 6-1(b), 6-2 and 7-12]**

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21 Pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12, the parties file this Stipulation  
22 and [Proposed] Order continuing the opposition and reply deadlines and the hearing date  
23 on Plaintiffs' Motion to Facilitate Notice Pursuant to 29 U.S.C. § 216(b) ("Motion").

24 Following receipt and review of Plaintiffs' Motion and the declarations Plaintiffs  
25 filed in support of it, Defendant noticed the depositions of five (5) of the declarants.  
26 Defendant intended to take these depositions in time to timely file its opposition to the  
27 Motion by August 15, 2007 (the current deadline). Plaintiffs have agreed to make the  
28

1 declarants available for deposition, but are unable to do so before the August 15 deadline  
 2 for Defendant's opposition. As such, the parties have met and conferred regarding a  
 3 further extension of the briefing schedule on this Motion so that Defendant may take the  
 4 noticed depositions before the deadline for its Opposition.

5 Because Plaintiffs have indicated a desire to depose individuals providing  
 6 declarations that Defendant may submit with its opposition, the parties have built into this  
 7 extended briefing schedule time for Plaintiffs to take some such depositions before the  
 8 deadline for their reply. Defendant hereby agrees to produce a reasonable number (to be  
 9 agreed to by the parties) of current employees for deposition if they are noticed by  
 10 Plaintiffs and if said deponents wish to be represented by RGIS' counsel or are otherwise  
 11 a PMK or agent of RGIS. RGIS further agrees to free the work schedules of a  
 12 reasonable number of employees who are scheduled for deposition whether said  
 13 employees are represented by RGIS' counsel or not.

14 Accordingly, the parties hereby stipulate to the following deadlines relative to  
 15 Plaintiffs' Motion:

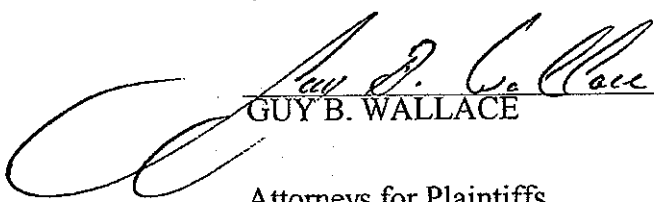
16 Defendant's opposition filed by August 29, 2007, with a stipulated page limit not  
 17 to exceed 28 total pages in the points and authorities, matching the pages in  
 18 Plaintiff's moving papers; and  
 19 Plaintiffs' reply filed by September 21, 2007.

20 The hearing on the Motion will take place on ~~October 19, 2007~~ <sup>NOVEMBER 9, 2007</sup> at 9:30 a.m., or at  
 21 such other date and time ordered by the Court. (The parties had intended to set the  
 22 hearing for October 5, 2007, but the Court is unavailable on that day. Defense counsel is  
 23 unavailable on the next hearing date, October 12, 2007.)

24 **IT IS SO STIPULATED.**

1 Dated: August 7, 2007


SCHNEIDER & WALLACE

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GUY B. WALLACE

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5 Attorneys for Plaintiffs  
CYNTHIA PIPER, et al.

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7 Dated: August 7, 2007

DRINKER BIDDLE & REATH LLP

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9   
CHERYL D. ORR

10 Attorneys for Defendant  
11 RGIS LLC, formerly known as  
RGIS INVENTORY SPECIALISTS

12 **CERTIFICATION**

13 I attest that Guy B. Wallace has concurred in the filing of this document.

14  
15 Dated: August 7, 2007

DRINKER BIDDLE & REATH LLP

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17   
CHERYL D. ORR

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19 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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21 Dated: August 8, 2007

22  
23 THE HONORABLE JUDGE  
United States

